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 12 *Attorneys for Plaintiff Parnell Jay Fair*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 PARNELL JAY FAIR, individually,

16 CASE NO: 2:20-cv-01841-JCM-BNW

17 Plaintiff,

18 **STIPULATION AND ORDER**
TO EXTEND PLAINTIFF'S DEADLINE TO
FILE HIS RESPONSE TO DEFENDANT
BROCK T. WENTZ, D.O.'S MOTION TO
DISMISS (ECF NO. 16)

19 *(First Request)*

20 v.
 21 LAS VEGAS METROPOLITAN POLICE
 22 DEPARTMENT, a political subdivision of the
 23 State of Nevada; L. TURLEY P# 15885,
 24 individually; A. RYNDAK P# 16540,
 25 individually; UNIVERSITY MEDICAL
 CENTER, D/B/A UNIVERSITY MEDICAL
 CENTER OF SOUTHERN NEVADA, a Nevada
 Governmental Entity; CHASITY TRAVIS,
 individually; JENNA A. DOUD, individually;
 JESSE WELLS, individually; CASEY ALLEN
 ROEHR, individually; HOWARD SHANE,
 individually; SCOTT KEVIN LEE, individually;
 BROCK T. WENTZ, individually; DOES I – X,
 and ROES I – X, inclusive

26 Defendants.

27 WHEREAS Defendant Brock T. Wentz, D.O. filed his Motion to Dismiss (“Motion”) on
 28 November 2, 2020 (ECF No. 16) in response to Plaintiff’s Complaint (ECF No. 1).

29 Pursuant to Local Rule IA 6-1(a), the Parties hereby stipulate and agree to extend the
 30 deadline for Plaintiff to file his response to Defendant Brock T. Wentz, D.O.’s Motion. The current
 31 deadline for Plaintiff to respond to Defendant Brock T. Wentz, D.O.’s Motion is **November 16**,

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1 **2020.** The new deadline for Plaintiff to respond to Defendant Brock T. Wentz, D.O.'s Motion will
 2 be **January 31, 2021.**

3 Good cause exists for the extension because Plaintiff is expecting to receive similar motions
 4 to dismiss from other medical provider Defendants who have not yet appeared in this case. Further,
 5 given that Plaintiff expects to receive numerous upcoming motions, the Parties believe that, in the
 6 interest of judicial economy, it would be prudent for Plaintiff to respond to Defendant Brock T.
 7 Wentz, D.O.'s Motion at the same time as he prepares responses to the other expected motions,
 8 once all of the other medical provider Defendants have made their appearances in this action and
 9 filed their responsive pleadings. Finally, good cause also exists to extend Plaintiff's response
 10 deadline to January 31, 2021 because the upcoming holidays will limit the availability for Plaintiff's
 11 counsel to draft a comprehensive and meaningful response.

12 This extension is the first request for an extension and is not submitted for the purpose of
 13 delay.

14 **IT IS SO STIPULATED AND AGREED.**

15 DATED this 6th day of November, 2020.

16 **LAGOMARSINO LAW**

17 _____
 18 /s/ *Daven P. Cameron*
 19 Andre M. Lagomarsino, Esq. (#6711)
 20 Daven P. Cameron, Esq. (#14179)
 21 3005 West Horizon Ridge Parkway, #241
 22 Henderson, Nevada 89052
 23 Attorneys for Plaintiff Parnell Jay Fair

16 DATED this 6th day of November, 2020.

17 **LEWIS BRISBOIS BISGAARD & SMITH
18 LLP**

19 _____
 20 /s/ *MELANIE L. THOMAS*
 21 Keith A. Weaver, Esq.
 22 Nevada Bar No. 10271
 23 Melanie L. Thomas, Esq.
 24 Nevada Bar No. 12576
 25 6385 South Rainbow Blvd. Suite 600
 26 Las Vegas, Nevada 89118
 27 Attorneys for Defendant Brock T. Wentz, D.O.

28 ///

29 ///

1 DATED this 6th day of November, 2020.

2 KAEMPFER CROWELL

3 /s/ Lyssa Anderson

4 Lyssa S. Anderson, Esq.

5 Ryan W. Daniels, Esq.

6 1980 Festival Plaza Drive, Suite 650

7 Las Vegas, Nevada 89135

8 *Attorneys for Defendants LVMPD, Lukas
Turley, and Alexander Ryndak*

9 DATED this 6th day of November, 2020.

10 McBRIDE HALL

11 /s/ Robert McBride

12 Robert C. McBride, Esq.

13 8329 West Sunset Road, Suite 260

14 Las Vegas, Nevada 89113

15 *Attorney for Defendant Jenna Doud and Jesse
Wells*

16 **IT IS SO ORDERED.**

17 DATED this 6th day of November, 2020.

18 PITEGOFF LAW OFFICE

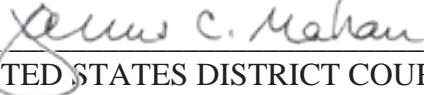
19 /s/ Jeffrey I. Pitegoff

20 Jeffrey I. Pitegoff, Esq.

21 911 Buffalo Drive, Suite 201

22 Las Vegas, Nevada 89128

23 *Attorney for Defendants University Medical
Center and Chasity Travis*

24 
25 UNITED STATES DISTRICT COURT JUDGE

26 DATED: November 9, 2020